

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JANE DOE 1; JANE DOE 2; JANE DOE 3; and
JANE DOE 4,

Plaintiffs,

v.

DARREN K. INDYKE AND RICHARD D. KAHN,
in their capacities as co-executors of THE ESTATE
OF JEFFREY E. EPSTEIN,

Defendants.

Case No. 1:19-cv-07675-GBD-DCF

JOINT STIPULATION AND [PROPOSED] ORDER STAYING ACTION

WHEREAS independent claims administration experts are designing and implementing the Epstein Victims' Compensation Program (the "Program") to resolve sexual abuse claims against decedent Jeffrey E. Epstein ("Decedent") in a non-adversarial alternative to litigation; and

WHEREAS Plaintiffs Jane Doe 1, Jane Doe 2, Jane Doe 3 and Jane Doe 4 (together, "Plaintiffs"; and together with Defendants Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein, the "Parties") seek to participate in the Program; and

WHEREAS the Parties seek to preserve their resources and judicial economy by staying this action unless and until Plaintiffs cease their participation in the Program; and

WHEREAS, should Plaintiffs resolve their claims against Decedent via the Program, the Parties will thereafter promptly discontinue this action with prejudice;


IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the Parties, that the captioned action is hereby stayed pending further Order of the Court. Defendants' Motion to Dismiss (Dkt. No. 26), filed on December 6, 2019, is withdrawn, without

prejudice to Defendants' rights and legal positions, including without limitation their right to move to dismiss Plaintiffs' First Amended Complaint (ECF Doc. 34).

Dated: January 2, 2020
New York, New York

Respectfully submitted,

THE BLOOM FIRM

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*Attorneys for Defendants Darren K. Indyke and
Richard D. Kahn, Co-Executors of the Estate
of Jeffrey E. Epstein*

Date: _____
New York, New York

HON. DEBRA FREEMAN
United States Magistrate Judge